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April 21, 2021

By ECF

Hon. Lorna G. Schofield, U.S.D.J.
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007
(212) 805-0288

Defendant's application is GRANTED in part. The initial pre-trial conference scheduled for April 29, 2021, is adjourned to **May 6, 2021, at 10:50 a.m.** The parties shall file a joint letter and proposed case management plan by **April 29, 2021**, in accordance with the Order at Dkt. No. 5. Defendant's request to extend the time to respond to the complaint is denied. Defendant shall file its answer or otherwise respond to the complaint by **May 3, 2021**. So ordered.

The Clerk of Court is respectfully directed to close the motion at Dkt. No. 9.

Dated: April 22, 2021
New York, New York

Re: Cristian Sanchez v. Panini America, Inc., Case No. 21-cv-01792

LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Dear Judge Schofield:

We represent defendant Panini America, Inc. ("Defendant") in the above-referenced action. We write to request a second 30-day extension of time for Defendant to respond to the complaint in this action, and an adjournment of the initial Conference, currently scheduled for April 29, 2021, until after Defendant has responded to the complaint.

We request an additional extension of time to respond to the complaint to afford the parties the opportunity to continue to discuss an early resolution of the matter. We have requested that counsel for Plaintiff Cristian Sanchez ("Plaintiff") consent to this request, but have not yet received a response.

We also request an adjournment of the Conference currently scheduled for April 29 until after Defendant has responded to the complaint. Because the parties anticipate reaching an early resolution of this matter, Defendant seeks not to spend its resources, as well as those of Plaintiff and the Court, by engaging in preparation for the Conference and appearing at the Conference, until necessary. Counsel for Plaintiff has consented to this request.

Defendant therefore respectfully requests entry of an order extending its time to answer or otherwise plead in response to the complaint to June 2, 2021, and adjourning the initial Conference until a date after June 2.

We appreciate the Court's consideration of these requests.

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Respectfully,

/s/ Andrew Braunstein

Andrew Braunstein

cc: All parties entitled to notice (by ECF)

Simon Fleischman (by email)